

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for Year 2009

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Name of Entity Covered by this Certification: Razorline, L.L.C.

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Name of Signatory: Gene Dry

Title of Signatory: Managing Member

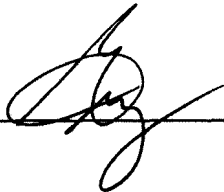
I, Gene Dry, certify that I am an officer of Razorline, L.L.C. ("Razorline"), and acting as an agent of Razorline, that I have personal knowledge that Razorline has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is a statement explaining how Razorline's procedures ensure Razorline is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules.

Razorline has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. Razorline has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.*, through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps Razorline has taken to protect CPNI include reviewing its CPNI practices and procedures for effectiveness and conducting employee training designed to ensure compliance with the FCC's modified CPNI rules.

Razorline has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed _____



Customer Proprietary Network Information Certification Statement

Razorline has established practices and procedures adequate to ensure compliance with section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This statement summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules, as modified by the Commission in 2007.

Safeguarding against pretexting

- Razorline takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. Razorline is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

Training and discipline

- Razorline trains its supervisory and non-supervisory personnel in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is, (b) join in and carry-out Razorline's obligation to protect CPNI, (c) understand when they are and when they are not authorized to use or disclose CPNI, and (d) keep records regarding customer complaints regarding CPNI and any breaches.
- Razorline has an express disciplinary process in place for violation of Razorline's CPNI practices and procedures. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.
- Razorline has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.

Razorline's use of CPNI

- Razorline uses CPNI in a manner consistent with section 222 of the Act and sections 64.2001 – 64.2011 of the Commission's rules.
- Razorline does not disclose or permit access to CPNI to track customers that call competing service providers.
- Razorline discloses and permits access to CPNI where required by law (*e.g.*, under a lawfully issued subpoena).
- Razorline does not use CPNI for marketing purposes.

Additional safeguards

- Razorline designates one or more officers, as an agent or agents of Razorline, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).

- For online customer access to CPNI, Razorline authenticates the customer (or its authorized representative) without the use of readily available biographical or account information. After the customer has been authenticated, Company utilizes a customer-established password to authorize account access. Razorline establishes passwords and has employed back-up authentication for lost or forgotten passwords consistent with the requirements of FCC rule 64.2010(e).
- Razorline may negotiate alternative authentication procedures for services that Razorline provides to business customers that have both a dedicated account representative and a contract that specifically addresses Razorline's protection of CPNI. In all other cases, Razorline only discloses call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record.
- Razorline notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
- In the event of a breach of CPNI, Razorline has practices and procedures in place to notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs Razorline to delay notification, or Razorline and the investigatory party agree to an earlier notification. Razorline will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.